

Control Number: 49261



Item Number: 37

Addendum StartPage: 0

SOAH DOCKET NO. 473-20-1120.WS  
PUC DOCKET NO. 49261

COMPLAINT OF MICHAEL E.  
MOORE AGAINST C WILLOW  
WATER COMPANY

§  
§  
§  
§

BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS

RECEIVED  
2020 MAR 12 AM 10:29

PUBLIC UTILITY COMMISSION  
FILING CLERK

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO MICHAEL E. MOORE  
QUESTION NO. STAFF 2-1 THROUGH STAFF 2-5

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Michael E. Moore, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

37


Date: March 12, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Rachelle Nicolette Robles  
Division Director

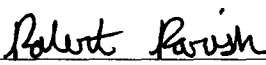
Heath D. Armstrong  
Managing Attorney

  
Robert Dakota Parish  
State Bar No. 24116875  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, Texas 78711-3326  
(512) 936-7442  
(512) 936-7268 (facsimile)  
Robert.Parish@puc.texas.gov

**SOAH DOCKET NO. 473-20-1120.WS  
PUC DOCKET NO. 49261**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on March 12, 2020 in accordance with 16 TAC § 22.74.

  
Robert Dakota Parish

**SOAH DOCKET NO. 473-20-1120.WS  
PUC DOCKET NO. 49261**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO MICHAEL E. MOORE  
QUESTION NO. STAFF 2-1 THROUGH STAFF 2-5**

**DEFINITIONS**

- A. "You" or "Your" refers to you Michael E. Moore, and any person acting or purporting to act on your behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "303 Hickory Trail" refers to 303 Hickory Trail, Lavernia, TX 78121 the current residence of Michael E. Moore.
- C. "C Willow" refers to C Willow Water Company, Shady Oaks Water Supply Company, LLC, and any other person or entity acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- D. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

**SOAH DOCKET NO. 473-20-1120.WS  
PUC DOCKET NO. 49261**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO MICHAEL E. MOORE**

**QUESTION NO. STAFF 2-1 THROUGH STAFF 2-5**

**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

**SOAH DOCKET NO. 473-20-1120.WS**  
**PUC DOCKET NO. 49261**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION**  
**TO MICHAEL E. MOORE**  
**QUESTION NO. STAFF 2-1 THROUGH STAFF 2-5**

- Staff 2-1      Please provide the exact date, if you are aware, water service at 303 Hickory Trail was switched from Keith Johanson to you.
- Staff 2-2      Please provide the gallonage of water you have used at 303 Hickory Trail for every month from July of 2018 until December of 2019. Provide any documentation or invoices that support this usage.
- Staff 2-3      Please provide a description and date of any water usage at 303 Hickory Trail from July 8, 2018 through October 1, 2018 that would cause you to use 1,000 or more gallons in any given 24-hour period. This includes but is not limited to water usage for a swimming pool, water leaks, excessive shower usage, excessive dishwasher usage, or excessive washing machine usage.
- Staff 2-4      Please provide any knowledge, documentation, or evidence you have of water usage at 303 Hickory Trail from October 2017 until June 2018. This includes any water usage by Keith Johanson or his construction company in the building or construction of your home.
- Staff 2-5      Please reference Page 3 of your Direct Testimony, provide any and all supporting documentation or evidence relating to your claims of incorrect meter reads observed by you or your spouse.